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August 7, 2006

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#### **HAND DELIVER**

The Honorable Kent A. Jordan United States District Court 844 King Street Wilmington, DE 19801

RE:

Bhatti v. J.P. Morgan Chase Bank, N.A.

C.A. No.: 05-690 (KAJ)

### Dear Judge Jordan:

I am enclosing with this letter a courtesy copy of a stipulation filed by the parties concerning the scheduling order in this matter. The original scheduling order had a discovery cut off of August 31, 2006. The date for dispositive motions is October 31, 2006. Thus, the extension of the discovery cut off of 30 days should not impact in any way effect the other portions of the scheduling order in this matter, with regards to dispositive motions and/or trial date.

We are requesting this additional time in order to finish taking defendant's individual depositions, some of who were not available, for personal medical reasons or otherwise in August 2006.

Thank you for Your Honor's consideration.

Respectfully,

Gary W. Aber

GWA/mac Enclosure

cc: Teresa A. Cheek, Esquire (By Hand)

# IN THE UNITED STATES DISTRICT COURT

## FOR THE DISTRICT OF DELAWARE

TARIQ BHATTI	)	
Plaintiff,	)	C.A. No.: 05-690 (KAJ)
V.	)	TRIAL BY JURY DEMANDED
J.P. MORGAN CHASE, a Delaware Corporation,	)	
Defendant. <u>S</u> 1	) ) [IPULA]	TION
IT IS HEREBY STIPULATED,	, by an	d between the parties, subject to the
approval of the Court, that the Sched	uling Or	der of this matter shall be amended as
follows:		
Discovery Cut Off	Septe	mber 30, 2006
All other deadlines remain the same as	in the o	riginal order.
ABER, GOLDLUST, BAKER & OVER	YOUN	G, CONAWAY, STARGATT & TAYLOR
/s/ Gary W. Aber GARY W. ABER (DSB #754) First Federal Plaza, Suite 600 702 King Street, P.O. Box 1675 Wilmington, DE 19899 302-472-4900 Attorney for Plaintiff	-	/s/ Teresa A. Cheek TERESA A. CHEEK (DSB #2657) 1000 West Street, 17 <sup>th</sup> Floor P.O. Box 391 Wilmington, DE 19899 302-571-6666 Attorneys for Defendant
SO ORDERED, this	day of	•
		The Honorable Kent A. Jordan